

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

ANDREEA IACOBETI

Plaintiff,

v.

GENNA LEIGH ROSE WEEKS

Defendant.

Case Number: 1:23-CV-1758

Judge: Adam B Abelson

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO STRIKE AFFIDAVIT**

Plaintiff, Andreea Iacobet, by her attorney, William C. Hudson, responds to Defendant's Motion to Strike Affidavit and states as follows:

1. Defendant argues the Affidavit of Elif Yilderal submitted as Exhibit A to Plaintiff's Opposition to Motion for Summary Judgment does not comply with the requirements of 28 U.S.C. § 1746(2) and Fed. R. Civ. P. 56(c)(4) because it is not dated and does not specifically state it is based on the personal knowledge of the affiant.
2. On or about February 21, 2024, Plaintiff filed an Amended Affidavit of Elif Yilderal (copy attached as Exhibit A).
3. The Amended Affidavit is dated and in it the affiant declares under penalty of perjury that the facts set forth are true and correct and based on her personal knowledge.
4. Any deficiencies in the initial Affidavit were drafting errors of the undersigned.
5. Defendant's Motion to Strike is rendered moot by the Amended Affidavit.
6. Acceptance of the Amended Affidavit in place of the initial Affidavit serves the interests of justice and does not result in unfair prejudice to Defendant.

Respectfully submitted,

/s/ William C. Hudson, Esquire

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of February 2024, the foregoing Response to Motion to Strike Affidavit was filed and served via the Court's CM/ECF system on Anne K. Howard, Esquire, and David H. Fleishman, Esquire, Twinbrook Metro Plaza, 12300 Twinbrook Parkway, Suite 540, Rockville, Maryland 20852, counsel for Defendant Genna Leigh Rose Weeks.

/s/ William C. Hudson, Esquire

Counsel for Plaintiff